



Kelly T. Currie  
KCurrie@crowell.com  
(212) 895-4257 direct


Crowell & Moring LLP  
590 Madison Avenue  
20th Floor  
New York, NY 10022  
+1.212.223.4000 main  
+1.212.223.4134 fax

June 8, 2022

Sentencing is adjourned from June 28, 2022 to  
October 11, 2022 at 2:00 p.m. in Courtroom 11D.  
**SO ORDERED.**  
Dated: 6/9/2022

**BY ECF**

Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



P. Kevin Castel  
United States District Judge

**Re: *United States v. Jason Tavarez, et al.*, 20 Cr. 301 (PKC)**

Dear Judge Castel,

We represent Jason Tavarez in the above-captioned case. We write to respectfully request a 90-day adjournment of Mr. Tavarez's sentencing, currently scheduled for June 28, 2022. This is our second request for an adjournment.

Since our last communication with the Court seeking a 30-day adjournment of sentencing, our ability to meet in person with our client in recent weeks has been impaired. The undersigned lead counsel for Mr. Tavarez contracted COVID-19 in late May and consequently was not able to visit Mr. Tavarez at the MDC for 14 days. This week, the MDC was closed to visitors starting June 7 because of an unspecified incident.

In addition, an issue regarding Mr. Tavarez's plea and potential Sentencing Guidelines calculation has arisen that may require us to seek appointment of shadow counsel to properly advise Mr. Tavarez. We have advised the Government of the nature of the issue. The requested adjournment will provide us time to fully discuss the issue in person with Mr. Tavarez to determine whether it is necessary to ask the Court to appoint other counsel. If we determine such a request is necessary, we will promptly communicate that to the Court and the Government. If it is not necessary, we would then have sufficient time to prepare a sentencing submission on our client's behalf.



We have conferred with counsel for the Government, and they have no objection to this request.

Respectfully submitted,

/s/ Kelly T. Currie

Kelly T. Currie

Andrea Charles

Rebecca Lennon Baskin

cc: All counsel of record (By ECF)